



December 19, 2011

Ex Parte Notice

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers, PS Docket No. 11-82

Dear Ms. Dortch:

On Thursday, December 15, 2011, the undersigned and Michael Romano, Senior Vice President of Policy, representing the National Telecommunications Cooperative Association ("NTCA") met with Lauren Kravetz, Vernon Mosley, and Gregory Intoccia from the Federal Communications Commission's Public Safety and Homeland Security Bureau ("Bureau Representatives") to discuss the above referenced matter. NTCA explained that although it represents about 580 small, rural, rate of return regulated incumbent telephone companies, a number of NTCA members also provide interconnected VoIP services. According to a 2010 survey of NTCA members, 14% of respondents offer voice over Internet protocol ("VoIP") service to their customers, up from 10% one year ago. Another 47% of those respondents not offering VoIP had plans to do so in the foreseeable future.¹

In mid-November, NTCA joined other rural groups explaining that it is necessary and appropriate to impose certain reasonable outage reporting requirements on interconnected VoIP providers, but expressed concern about the Commission's proposals.² During the meeting, the Bureau Representatives sought input on the appropriate level of VoIP outage reporting. The participants discussed the possibility of adopting a four hour and 30 day reporting requirement for VoIP outages that impact Public Safety Answering Points or special facilities, and a 24 hour and 30 day reports for other outages affecting interconnected VoIP services. NTCA agreed that such revised proposals

¹ NTCA 2010 Broadband/Internet Availability Survey Report (released January 2010). Available at: http://www.ntca.org/images/stories/Documents/Advocacy/SurveyReports/2010_NTCA_Broadband_Survey_Report.pdf

² See NTCA and OPASTCO Joint *ex parte* Letter, *Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers*, PS Docket No. 11-82 (November 14, 2011).

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would substantially lessen the burden on providers and appear reasonable and appropriate, although it also noted that such requirements should apply more generally to other services as well. NTCA noted that the Commission has a responsibility to ensure that consumers of all voice services have reliable access to E911 services and the public safety benefits derived from the revised reporting requirements, as presented, appear to outweigh potential burdens.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact me at (703) 351-2020 or jcanfield@ntca.org.

Sincerely,

/s/ Jill Canfield

Jill Canfield

Director, Legal & Industry

Cc: Lauren Kravetz
Gregory Intoccia
Vernon Mosley

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